

UNITED STATES DISTRICT COURT

for the

District of Nebraska

United States of America)

v.)

TRAYNELL D. TONEY)

Case No. 8:17MJ217

FILED
US DISTRICT COURT
DISTRICT OF NEBRASKA

JUN 15 2017

OFFICE OF THE CLERK

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of June 2, 2017 in the county of Douglas in the
District of Nebraska, the defendant(s) violated:

Code Section

Offense Description

18 U.S.C. § 2113(a)

On or about the 2nd day of June, 2017, in the District of Nebraska, the defendant, Traynell D. Toney, by force, violence and intimidation did take from the person or presence of another money, namely \$3,170.00, belonging to and in the care, custody, control, management, and possession of the U.S. Bank, a bank whose deposits were then insured by the Federal Deposit Insurance Corporation.

In violation of Title 18, United States Code, Section 2113(a).

This criminal complaint is based on these facts:

See Attached Affidavit

☒ Continued on the attached sheet.

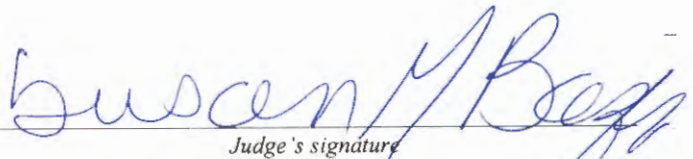
Complainant's signature

S.A. John D. Hallock, FBI

Printed name and title

Sworn to before me and signed in my presence.

Date:

6-15-17

Judge's signature

SUSAN M. BAZIS, U.S. Magistrate Judge

Printed name and title

City and state:

Omaha, Nebraska

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT AND ARREST WARRANT

DISTRICT OF NEBRASKA)
) ss. **Affidavit of SA John D. Hallock**
COUNTY OF DOUGLAS)

I, John D. Hallock, having been first duly sworn, do hereby depose and state as follows:

INTRODUCTION

1. I am a Special Agent (SA) of the Federal Bureau of Investigation (FBI), and have been so employed for approximately fifteen (15) years. I am currently assigned to the FBI Omaha Division, Violent Crimes Squad, Greater Omaha Bank Robbery Task Force (GOBRTF), where I am responsible for investigating violations of various criminal statutes, including those pertaining to Bank Robbery, in violation of Title 18, United States Code, Section 2113(a) and 2. I have been the Case Agent and have assisted in violent crimes and Bank Robbery investigations, which have resulted in search warrants, arrests, and the seizure of forfeiture and assets. Prior to joining the FBI, I served in the United States Air Force (USAF), both active duty and National Guard for 8 ½ years, and then served as a police officer for seven years.

2. I have received relevant training in violent crime and Bank Robbery investigations from the FBI Academy in Quantico, Virginia. I have also acquired knowledge and information about the means and methods of violent crimes to include Bank Larceny, to include informal training, other law enforcement officers and investigators, informants, persons whom I have arrested and/or interviewed, and my participation in multiple investigations related to Bank

Robbery investigations. The aforementioned investigations ultimately led to the arrests and convictions of those persons who violated those federal crimes.

PURPOSE OF THIS AFFIDAVIT

3. This affidavit is submitted in support of a criminal complaint and arrest warrant for TRAYNELL DUPREE TONEY, a black male, born in 1993. Since this affidavit is being submitted for the limited purpose of securing an arrest warrant, I have not set forth each and every fact known to me regarding this investigation. The statements contained in this affidavit are based in part on the investigation that I have conducted and information provided to me by other law enforcement officers verbally, and through written reports.

OVERVIEW OF INVESTIGATION

4. On June 2, 2017, at approximately 12:22 p.m., your affiant was notified through the FBI Omaha Division Radio Room that a bank robbery took place at the US Bank, located inside the Baker's Supermarket, 5555 North 90th Street, Omaha, Nebraska. The US Bank is federally insured by the Federal Deposit Insurance Corporation (FDIC) and is assigned FDIC Number 5134-9. The victim bank teller (whom I will identify as DS) stated that the bank robber approached DS and provided DS with a demand note that read something to the effect of "Gun in my hoodie, Give me all the money, or I will kill you. No dye – make it fast." DS then provided the bank robber \$3,170.00 in United States currency and an Electronic Tracking System (ETS) Tracker Pack, which was included in the United States currency. DS and other witnesses described the bank robber as a black male, in his early 20's, approximately 5'6" tall

and weighing 145 pounds. DS and other witnesses reported that the bank robber was wearing dark clothing, to include a gray or black hooded sweatshirt, a black or blue baseball cap, black pants, and mirrored sunglasses.

5. After the bank robbery occurred, witnesses reported that the bank robber ran out of the bank, and entered into a black colored sedan in the parking lot, which was reported to be possibly a Nissan model vehicle. The ETS showed that the bank robber traveled north on 90th Street, to Westbound Military Avenue, southbound on 99th Street continuing through Fort Street onto Parkview Drive, where the ETS was recovered near the corner of Parkview Drive and Larimore Street in Omaha, Nebraska. Video surveillance was obtained from a nearby residence which captured a dark colored sedan traveling at a high rate of speed along the route of travel.

5. On June 2, 2017, the FBI Omaha Division Evidence Response Team (ERT) responded to the US Bank at 5555 North 90th Street and processed the crime scene. Evidence collected at the scene included the robbery demand note left at the teller counter, the ETS which was recovered near the corner of Parkview Drive and Larimore Street, and a Mountain Dew Bottle which was recovered in the Baker's Supermarket. A witness, who is an employee at Baker's Supermarket, reported that before the bank robbery occurred, the bank robber walked into the Baker's Supermarket, and stood behind a potato chip stand and started staring at the bank. The witness reported that the bank robber selected a Mountain Dew Bottle from a cooler, walked away from the potato chip stand, and then placed the Mountain Dew Bottle in another cooler. The witness reported that the bank robber then walked to the customer service area of Baker's Supermarket where the witness saw that the bank robber was holding a piece of paper and the bank robber's hand was shaking. The witness reported that the bank robber then walked

toward the US Bank, and noticed a few minutes later that the bank was closed, and assumed the bank robber had just robbed the bank.

6. On June 9, 2017, at approximately 11:52 a.m., your affiant was notified through the FBI Omaha Division Radio Room that a bank robbery took place at the US Bank, located inside the Baker's Supermarket, Eagle Run Baker's Supermarket, 13250 West Maple Road, Omaha, Nebraska. The victim bank teller (whom I will identify as JA) was presented a demand note that read "I have a gun. Give me the money or I will kill a customer. No dye no tracker." JA complied with the bank robber's request, and provided the bank robber with \$2,427.00 in United States currency. JA and other witnesses described the bank robber as a black male, between 18-25 years old, approximately 5'5" to 5'6" tall, weighing 135 pounds, wearing a hooded sweatshirt with the hood up, a baseball cap, and sunglasses. Witnesses stated that after the bank robbery occurred, the bank robber fled the bank.

7. On June 9, 2017, the FBI ERT Team responded to the crime scene at the Baker's Supermarket Eagle Run US Bank, 13250 West Maple Road, Omaha, Nebraska for purposes of evidence collection. Evidence collected at the scene included the robbery demand note, two fingerprints lifted from the US Bank teller counter, and elimination prints of employees that touched the demand note.

8. Video Surveillance Photographs of both above-mentioned bank robberies were provided to the Omaha Police Department (OPD) Public Information Office (PIO) in which the images were distributed to the local media. A comparison of the video surveillance photographs of both bank robberies revealed that the robber in both banks had very similar physical characteristics. On June 9, 2017, a Crimestoppers Tip was received by the OPD where

the subject named in the robberies was TRAYNELL TONEY. On June 12, 2017, the collected evidence from the two robberies was taken to the Douglas County, Nebraska Sheriff's Office (DCSO) for purposes of latent fingerprint testing.

9. On June 12, 2017, the investigation determined that TONEY was either currently employed or previously employed at JMS Manufacturing Inc., located at 8805 Vernon Avenue, Omaha, Nebraska. On June 12, 2017, your affiant and OPD Detective Jon Martin made contact with the manager of JMS Manufacturing Inc., whom I will identify as LA. LA reported that TONEY is currently employed at JMS Manufacturing Inc., and described TONEY as a pretty good worker. LA checked the time cards for TONEY, and reported that, based on the time cards, TONEY was not at work on June 2, 2017 (the day of the US Bank robbery at 5555 North 90th Street) and called in sick on June 9, 2017 (the day of the US Bank robbery at 13250 West Maple Road). LA reported that TONEY works the 3:00 p.m. to 11:00 p.m. at JMS Manufacturing Inc.

10. On June 14, 2017, the DCSO, Forensics Services Division, reported that three latent fingerprints of importance were developed from the June 2, 2017 US Bank robbery at 5555 North 90th Street, Omaha, Nebraska (one print developed on the robbery note and two prints developed on the Mountain Dew bottle) which were identical to TRAYNELL DUPREE TONEY, a black male, born in 1993.

11. On June 14, 2017, members of the GOBRTF went to JMS Manufacturing Inc. in order to locate TONEY. At approximately 3:05 p.m., TONEY arrived at JMS Manufacturing Inc. in a gray 2015 Nissan Sentra, with Nebraska License TYL171. The vehicle matched the description of the vehicle that fled the June 2, 2017 US Bank robbery. TONEY, who was in the

passenger seat of the vehicle, was taken into custody without incident and was transported to the OPD Central Headquarters for purposes of an interview.

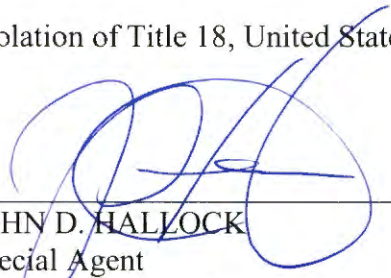
12. On June 14, 2017, OPD Detective Jon Martin, who is assigned to the GOBRTF, interviewed TONEY after TONEY waived his Miranda rights. TONEY admitted to robbing the US Bank at 5555 North 90th Street, Omaha, Nebraska on June 2, 2017, and robbing the US Bank at 13250 West Maple Road, Omaha, Nebraska on June 9, 2017. TONEY stated that he was having trouble financially, and used the United States currency to gamble on the National Basketball Association (NBA) Finals, and used the United States currency for food and rent. TONEY stated that he used his girlfriend's 2015 gray Nissan Sentra to commit the robberies, as TONEY explained that his girlfriend was asleep and he took the vehicle without her knowledge to commit the robberies.

CRIMINAL HISTORY OF TRAYNELL DUPREE TONEY

12. TONEY is a black male, born in 1993, with black hair and brown eyes. A criminal records check for TONEY indicates he possesses FBI record number 343312AE9 and Nebraska Identification Number NB572186. TONEY has been arrested for Receiving Stolen Property, Possession of Marijuana (Omaha Police Department 04/10/2014); carrying a Concealed Weapon, Possession of Marijuana (Omaha Police Department 06/17/2014); and Trespassing and Shoplifting (Omaha Police Department 12/26/2014).

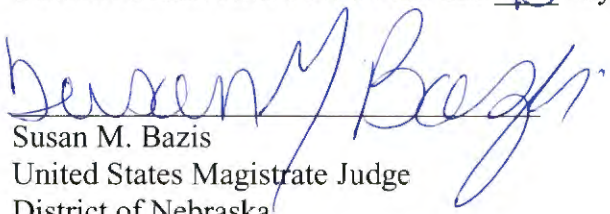
13. Based upon the above facts and circumstances, I believe sufficient probable cause exists to authorize a criminal complaint and arrest warrant for TRAYNELL DUPREE TONEY,

regarding the violations of Bank Robbery, in violation of Title 18, United States Code, Section 2113(a) and 2.



JOHN D. HALLOCK
Special Agent
Federal Bureau of Investigation

Subscribed and sworn before me this 15 day of June 2017.



Susan M. Bazis
United States Magistrate Judge
District of Nebraska